

PAT 050942291

1012 Water Street
Meadville, Pennsylvania 16335
Telephone: A. C. 814/332-6848
February 28, 1990

CERTIFIED MAIL #P 425 664 369

SINGEN AMERICAN Meter Div
ERIE
Gon
NOTICE OF VIOLATION

Subject: American Meter Company
City of Erie, Erie County

Mr. Robert E. Axe
American Meter Company
920 Payne Avenue
Erie, PA 16512

Dear Mr. Axe:

Pursuant to the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, P.L. 380, No. 97, 35 P.S. §6018.101 et seq., and the Hazardous Waste Management Rules & Regulations promulgated on September 14, 1985, 25 Pa. Code §75.1 et seq., the Department regulates the management of solid and hazardous waste within the Commonwealth of Pennsylvania.

On February 21, 1990 an inspection was conducted of the American Meter Company facility by this Department and the US Environmental Protection Agency. During the inspection, a container of hazardous waste located in the first floor degreasing and painting room, was not sealed and did not have an accumulation date marked. The failure to seal and properly date containers holding hazardous waste is a violation of the following:

1. Section 75.262(g)(1)(iv) of the Commonwealth's Hazardous Waste Regulations which states, "On each container, the date on which hazardous waste was placed in that container shall be clearly marked and visible for inspection."
2. Section 75.265(q)(3) of the aforementioned Regulations which states, "A container holding hazardous waste shall be kept closed during storage, except when it is necessary to add or remove waste."

In order to abate the above violations, the following should be done:

1. All containers of hazardous waste should be kept sealed except for when waste is being added or removed. Consideration should be given to posting signs to this effect in areas where containers are temporarily stored.
2. Immediately mark all containers of hazardous waste with the date the waste was first put in the container. The marked date should be visible for inspection.

Failure to abate the above referenced violations may result in the initiation of legal action.

February 28, 1990

The Solid Waste Management Act (Act 97) provides for separate penalties for violation of any section, any rule or regulation of the Department, or any permit condition.

This Notice of Violation does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this Notice or the conditions upon which this Notice is based.

This Notice shall not be construed so as to waive or impair any rights of the Department of Environmental Resources heretofore or hereafter existing. This Notice shall not be construed as a final action of the Department of Environmental Resources.

Should you have any questions regarding this Notice, please do not hesitate to contact me at this office.

Sincerely,



John R. Crow
Solid Waste Specialist
Bureau of Waste Management

JRC/fb

bc: Erie County File
Meadville Regional Office
BWM - Compliance & Monitoring
J. Mead
EPA
Chron.
J. Crow

Hazardous Waste Inspection Report
Generators — Part A

Date of inspection 2-21-90 Time start 1:00 Time finish 3:20
 Name of inspector JOHN R CROW
 Company, installation name American Meter Company
 Location 920 PAYNE Ave, Erie PA 16512
 County ERIE Municipality ERIE
 Identification number PAD050942291
 Name of responsible official Mr Robert E. Axe
 Title Personnel Manager
 Mailing address P.O. Box 1251, 920 PAYNE AVE ERIE PA 16512
 Area code and telephone number (814) 456-7553
 Name of person interviewed Mr Robert Axe
 Title Personnel Manager
 Mailing address (if different from above) Above
 Area code and telephone number Above

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☒ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. ~745 kg./mo. BASED ON FIRST Three Quarters of 1989
 b. ~8,920 kg./yr. As marked on Quarterly reports

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
F002		
F005	ENSCO Inc	Americas oil Road
F001		EL Dorado AR 71730
D001		
D009	Chemical Waste Mgt. Inc Emelle Facility	Ala. Highway 17 at Mile Marker 163, Emelle, Ala 35459

Hazardous Waste Inspection Report
Generators — Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				R E Q U I R E M E N T		Chapter Citation
1	2	3	4			75.262
✓				Hazardous waste determination, copies available		(b)
✓				Identification number		(c)(1)
✓				Hazardous waste shipments offered only to licensed transporters		(c)(4)
✓				Authorization received from TSD facility for wastes shipped off-site		(d)
	✓			PA manifest used for intrastate shipments		(e)(2)
✓				Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
✓				Manifests filled out properly and completely		(e)(7)
✓				Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
✓				Proper U.S. DOT shipping containers or packages		(f)(1)(i)
		✓		Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
✓				Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
		✓		Placards offered to transporter		(f)(2)
		✓		Wastes accumulated on-site for less than 90 days		(g)(1)(i)
✓				Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
			✗	Containers managed in accordance with 75.265(q)(1)–(9)		(g)(1)(iii)
			✗	Containers clearly marked with accumulation date and visible for inspection		(g)(1)(iv)
✓				Records retained at designated location for 20 years		(h)
✓				Quarterly reports submitted to the Department		(i)
	✓			Exception reporting procedures followed		(j)
	✓			Hazardous waste disposal plan, if required		(l)
	✓			Spill reporting procedures followed		(m)(1)
✓				Preparedness, Prevention and Contingency Plan and implemented		(m)(5)
	✓			Special requirements followed for international shipments		(o)
✓				On the job or classroom personnel training program [75.265(f)]		(g)(1)(6)
		✓		Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 2-21-90 Identification Number PA050942291
Company, Installation Name American Meco Company
County Erie Municipality Erie

1. This follow-up inspection was conducted with Mr. Jim Bailey and Vern Butler of the E.P.A.
2. Facility has reduced painted related wastes significantly since 1989, due to modified spray painting equipment.
3. Records should be maintained that document how much waste water is generated from paint booth area.
4. A drum located in the first floor degreasing room, similar to the drum noted in the December inspection, did not have an accumulation date indicated and was not sealed. If frequent additions are made to this container, a self-sealing funnel or some other device that ensures drum closure should be utilized. The failure to seal containers of hazardous waste is a violation of section 75.265(9X3) of the hazardous waste regulations.
5. The floor of the hazardous waste storage area should be sealed and a containment berm constructed in such a way as to contain 10% of total stored liquids. An outline of what is to be done should be sent to this office by March 30, 1990.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____ Date _____
Inspector (signature) [Signature] Date 2-23-90

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 2-21-90 Identification Number PAPO50942291
Company, Installation Name AMERICAN Meter Company
County ERIE Municipality ERIE

6. As of August 15, 1988, facility has been owned
by Rubiges, a West German Company.

7. The hazardous waste storage area should be
inspected weekly, the date of inspection and any
deficiencies should be recorded.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) [Signature] Date 2-23-90
Inspector (signature) [Signature] Date 2-23-90

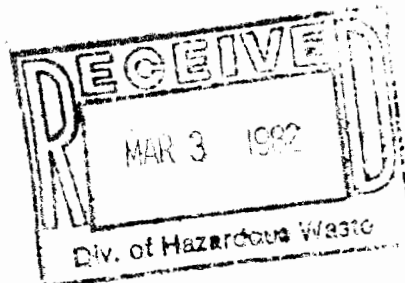
1012 Water Street
Headville, Pennsylvania 16335
Telephone: A. C. 814/724-8526
February 24, 1982

File
copy *EPA*

CERTIFIED MAIL #8100447

Subject: Hazardous Waste Inspection Report
ID #PAD050942291

Mr. David D. Jackson
Singer, American Meter Division
P. O. Box 1251, 920 Payne Avenue
Erie, Pennsylvania 16512



Dear Mr. Jackson:

Please find enclosed your copies of Hazardous Waste Inspection Reports resulting from a February 12, 1982 inspection of the Singer, American Meter Division facility located in the City of Erie, Erie County, Pennsylvania. Singer was evaluated as a generator and storer of hazardous waste.

The following items were determined to be in non-compliance with Department Rules & Regulations concerning hazardous waste management:

1. Proper Shipping Containers [75.262(f)(1)(1); (g)(1)(ii); 75.265(q)(1), (4)] - many drums being held in the storage area were in poor condition and unsuitable for shipping. Some of the drums were dented while others were bulging.
2. Required Pennsylvania Label [75.262(f)(1)(iii)] - hazardous waste labels utilized by Singer do not possess a Pennsylvania notification and the required Pennsylvania and EPA phone numbers.
3. Artificial Barrier at Active Portion [75.265(d)(2)(ii)] - the hazardous waste drum storage area is situated at the end of a general yard storage area and does not possess a barrier separating the waste from the activities of any unauthorized personnel.
4. Proper Signs [75.265(d)(3); (g)(1)] - the hazardous waste drum storage area does not possess the proper signage. "Danger - Unauthorized Personnel Keep Out" signs should be posted around the perimeter of the drum storage area. Furthermore, because ignitable paint wastes are also stored at the drum storage area, "No Smoking" signs should also be posted.

February 24, 1982

5. Adequate Isie Space [75.265(h)(6)] - the drum storage area was being operated in such a manner that the unobstructive movement of personnel, etc., within the confines of the area was not possible. Specifically, too many drums were being stored in the storage area and thus many drums could not be easily inspected for leaks, ruptures, etc.
6. PPC Plan [75.262(m)(5); 75.265(i)] - no PPC Plan was available for review.
7. Written Operating Records [75.265(k)] - no written operating records were available for review.
8. Closure Plan [75.265(o)(2-9)] - no Closure Plan for the drum storage area was available for review.
9. Weekly Inspection of Drum Storage Area [75.265(q)(5)] - the drum storage area inspection sheets revealed that inspections of the site were not being conducted weekly.
10. Proper Setback Distance from Property Line [75.265(q)(6)] - because the drum storage area contains ignitable wastes, it is required that drums containing the ignitable wastes be set back 15 meters from the property line. The entire drum storage area was within 15 meters of the property line.

The hazardous waste storage area is basically unacceptable. The quantity of drums being stored was much greater than what can be stored and still conform with Department storage requirements [75.265(h)(6)]. It is suggested that Singer immediately begin shipping the present accumulation of wastes to facilities authorized to handle those wastes. Subsequent to the initial shipment, Singer should then ship all hazardous wastes within 90 days of their generation. By making frequent shipments, undesirable storage conditions can be lessened. Stored drums containing paint wastes must conform with the 15 meter setback requirements of [75.265(q)(5)]. To afford protection from the weather, some rudimentary form of cover should be placed over the drum storage area.

As mentioned on February 12, Singer should not attempt to construct a hazardous waste storage area until such time final regulations concerning storage area construction are established. Please contact our Harrisburg office at 717/787-7331 concerning the publication of the aforementioned final regulations. Once the new storage regulations become finalized and you obtain them, it is suggested that you contact Mr. Gary Galida, Chief of the Division of Hazardous Waste Management for further instructions.

Finally, you should immediately make a hazardous waste determination of the mercury contaminated water.

Mr. David D. Jackson

-3-

February 24, 1982

Within 30 days of receipt of this letter, please indicate to the undersigned in writing of how and when Singer can correct/address the aforementioned violations/comments. Failure to comply with this request may result in the initiation of legal action. A reinspection will be conducted upon your reply.

If you have any questions concerning these matters, please do not hesitate to contact me.

Sincerely,



Ricardo F. Gilson
Solid Waste Specialist
Bureau of Solid Waste Management

RFG/skg

Enclosure

bc: BSWM - Central Office
Erie County File
Meadville Regional File
Chron.

